

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SHAILENDRA GHORPADE,

:

Plaintiff,

:

Civil Action No. 14-cv-4379 (JPO)

v.

:

ECF CASE

METLIFE, INC., METLIFE GROUP, INC., and
CHRISTOPHER TOWNSEND, in his individual
and official capacities,

:

**AFFIDAVIT OF
CHRISTOPHER TOWNSEND**

:

Defendants.

:

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Christopher Townsend, being duly sworn, deposes and says:

1. On or about August 1, 2012, I was hired by MetLife Asia Pacific Limited as President-Asia and Head of MetLife's Asia region. Currently, I still hold the position of President-Asia for MetLife and Head of MetLife's Asia region.

2. When I began my employment with MetLife, I did not have responsibility for India, because India was not a part of MetLife's Asia region.

3. On November 1, 2012, India was made part of MetLife's Asia region and I gained responsibility for India.

4. On November 1, 2012, when India was made part of MetLife's Asia region, Shailendra Ghorpade, then Chairman of India, began reporting directly to me.

5. At all times during my employment with MetLife, I have been located in Hong Kong and have worked in MetLife's Hong Kong office.

6. I have never worked in New York for MetLife.

7. I do travel to New York in connection with my MetLife employment on occasion. In 2012, I traveled to New York for a two-week long initiation when I began my employment with MetLife. In addition, in 2012, I traveled to New York for MetLife business once per month from September 2012 to December 2012. In 2013, I traveled to New York in connection with my MetLife employment on five occasions. In 2014, I have traveled to New York for business for MetLife on less than five occasions. Besides the two-week initiation, when I have traveled to New York for MetLife business, I have stayed in New York for a minimum of two days and a maximum of five days.

8. In my role as President-Asia, I travel to other countries, including Japan, China, Australia, the United Arab Emirates, the United Kingdom and beyond.

9. I do not have a permanent or a dedicated office in New York at MetLife's office building. Instead, when I travel to New York on business, I use an open office on the executive group floor. Likewise, I do not maintain an office in New York for personal (non-MetLife) business.

10. I do not have a dedicated telephone extension in New York at MetLife. Likewise, I do not have a personal telephone number in New York.

11. I do not conduct any personal (non-MetLife) business in New York.

12. I do not maintain a bank account in New York.

13. I do not have a residence in New York.

14. I do not own any property in New York.

15. I did not terminate Mr. Ghorpade's employment in New York, nor did I make the decision to terminate Mr. Ghorpade's employment in New York. Moreover, I did not make the decision that Mr. Ghorpade should not be the CEO of India in New

York. In fact, I did not make any decisions regarding the terms and conditions of Mr. Ghorpade's employment in New York.

16. I never attended a meeting with Mr. Ghorpade in New York.

The foregoing is true and correct to the best of my knowledge.

SWORN AT

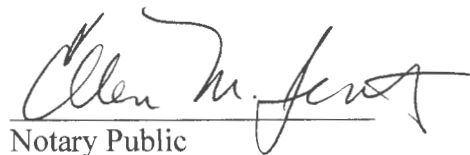
New York, New York

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Christopher Townsend

this 2nd day of Sept. 2014.

Before me,


Notary Public

ELLEN M. JENTZ
Notary Public, State of New York
No. 01JE4927206, Nassau County
Comm. Expires April 11, ~~2014~~ 2014